

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE

2004 JUL -7 P 12:12

PAUL W. McCREE,
Plaintiff

v.

PENSION BENEFIT
GUARANTY
CORPORATION,
Defendant

U.S. DISTRICT COURT
DISTRICT OF MASS.

CIVIL ACTION NO. 04-CV-11334-JLT

MOTION TO WITHDRAW AS COUNSEL

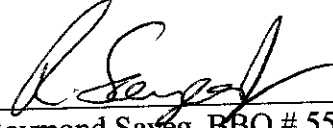
Your undersigned, counsel for the Plaintiff Paul W. McCree, Jr. in the above-captioned matter, requests that this Honorable Court enter an Order permitting all attorneys from the Law Office of Raymond Sayeg, Four Longfellow Place, 35th Floor, Boston, Massachusetts who have previously entered their appearances in this matter, including but not limited to Raymond Sayeg, to withdraw as counsel of record for Paul W. McCree, Jr. Undersigned counsel state that an Order allowing withdrawal is necessary for the following reasons:

1. During the course of this representation, irreconcilable differences have arisen between undersigned counsel and Plaintiff relative to the theories and manner of litigation;
2. The irreconcilable differences have caused a substantial breakdown in communication between your undersigned and the Plaintiff;
3. The foregoing differences are so acute that they now render it impossible for undersigned counsel to continue to represent this Plaintiff effectively;

4. In recognition of this breakdown in communication, by agreement, Plaintiff Paul W. McCree Jr., is proceeding on a Pro Se basis and has filed The Amended Complaint on his own behalf on June 30, 2004.

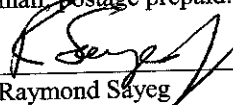
WHEREFORE, Counsel for Plaintiff Paul W. McCree, Jr. requests that this Court grant this motion.

Respectfully submitted,
PAUL W. McCREE, JR.
By his attorneys,


Raymond Sayeg, BBO # 555437
Law Offices of Raymond Sayeg
4 Longfellow Place, 35th Floor
Boston, MA 02114
(617) 742-1184

CERTIFICATE OF SERVICE

I, Raymond Sayeg, hereby certify that a true and exact copy of the foregoing Motion to Withdraw As Counsel was served upon the Plaintiff, Paul W. McCree, Jr., 173 Goodman's Hill Road, Post Box 77, Sudbury, MA 01776, this 2nd day of July, 2004 by first class mail, postage prepaid.


Raymond Sayeg